

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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RAMON SOTO and CHARLENE MORRIS,
individually and on behalf of all others similarly
situated,

Plaintiffs,

Case No.: 1:25-cv-00405 (ARW)

v.

PIM BRANDS, INC.,

Defendant.

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**PLAINTIFFS' MOTION FOR LEAVE TO FILE RESPONSE TO
DEFENDANT'S PETITION FOR ATTORNEY'S COSTS AND FEES**

1. On September 24, 2025, this Court granted Defendant's Motion for Costs and Fees, and ordered Defendant to submit a petition for fees [ECF 32]. In its Order, the Court found that "to the extent PIM's work is no longer useful in the present action, costs and fees are appropriate." *Id.* at 5.

2. On October 8, 2025, Defendant filed its Petition for Attorneys' Fees and Costs, seeking \$102,835.50 in attorneys' fees and \$7,072.18 in litigation "costs," representing what appears to be almost 100% of the total fees purportedly expended in defending the New York Action with little or no justification for the fees. [ECF 33].

3. Plaintiff seeks leave to file a response to the amount of fees and costs sought by Defendant, given that much of the work undertaken by defense counsel and identified in their time entries will be useful to Defendant's defense here.

4. Plaintiffs' counsel asked that Defendant's counsel consent to Plaintiffs' filing of a response. Defendant's counsel stated that it would not do so without seeing Plaintiffs' opposition. Given that Plaintiffs understand that Defendant will not agree with Plaintiffs' opposition, seeking Defendant's approval of the opposition is futile.

WHEREFORE, Plaintiffs respectfully request leave to file the attached Response In Opposition to Defendant's Petition for Fees and Costs, and such other and further relief as this Court deems appropriate.

Dated: October 15, 2025

Respectfully submitted,

DENLEA & CARTON LLP

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